

FILED

OCT 24 2019

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

REGINALD ALLEN,

Defendant.

4:19CR887 RLW/JMB

MOTION FOR PRE-TRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Anthony Box, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the United States of America states as follows:

1. Defendant is charged with being a Felon in Possession of a Firearm in violation of Title 18 United States Code Section 922(g)(1).
2. Pursuant to Title 18, United States Code, Section 3142(g), the weight of the evidence against defendant, defendant's history and characteristics, and the nature and seriousness of the danger to any person or the community that would be posed by defendant's release warrant defendant's detention pending trial.
3. There is a serious risk the defendant will flee and is a danger to the community.
4. On September 2, 2019, St. Louis Metropolitan Police Department officers noticed a vehicle traveling at a high rate of speed and failing to stop at posted signs in the Fairgrounds Park

neighborhood. As a result, officers conducted a traffic stop. As they approached the vehicle, they observed the front seat passenger, later identified as Reginald Allen, with an AR-15 rifle between his legs. The officers also noticed another individual in the back seat trying to conceal a pistol with an extended clip under his seat. After running computer inquiries, it was determined that Allen and the other passenger were convicted felons. As a result, they were taken into custody.

5. A review of the court documents reveal that the defendant has the following felony convictions:

- A. Tampering with a motor vehicle 1st degree and resisting/interfering with arrest in 2015. The defendant's probation was revoked and he was sentenced to 3 years' confinement.
- B. Receiving stolen property in 2016. The defendant was sentenced to 3 years' confinement.

6. The defendant's criminal history and the nature and circumstances of the offense charged reflects the attitude and behavior of an individual who poses a flight risk and danger to the community if released.

WHEREFORE, the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

/s/ Anthony Box
ANTHONY BOX #58575MO
ASSISTANT UNITED STATES ATTORNEY